

Ryan ManaRa (lawe.lima.gps@protonmail.com)
 Moloaa, Kawaihau
 Mokupuni Kauai
 Ko Hawaii Pae Aina. H. I.

CC:DKW/KJM/Filer (by email)

UNITED STATES DISTRICT COURT
 DISTRICT OF HAWAII

Noa Kanealii Io Pono I Kelii Ua Mau, Ko Hawaii
 Pae Aina

Kanaka-Maoli, Plaintiffs,

vs.

KALALEA TRUST, Carl Langschmidt;
 KALALEA PLANTATION LLC, Benjamin F.
 Garfinkle; MOLOAA FARMS LLC, Jeffrey
 Linder; STATE OF HAWAII, Gov. Josh Green,
 Attorney General, Anne E. Lopez, Secretary of
 State, Sylvia Luke; Mark Recktenwald, Tyler C.
 Saito; Michael Soong, Hiro Shimada, Todd G.
 Raybuck and Mathew Bracken; US FEDERAL
 GOVERNMENT; US CONGRESS, Kevin
 McCarthy, Charles E. Shumer; US PRESIDENT,
 Joseph Robinette Biden Jr.; US DEPARTMENT
 OF JUSTICE, Attorney General, Merrick Garland,
 US DEPARTMENT OF STATE, Secretary of
 State: Antony Blinken; US FEDERAL BUREAU
 OF INVESTIGATION, Director, Christopher A.
 Wray, Special Agent, Robert M. King; UNITED
 STATES OF AMERICA; KO HAWAII PAE
 AINA, Prime Minister Keliihuluhulu ; Attorney
 General Thomas Anthony and Deputy Foreign
 Minister, Hawe Keliikoa

Defendants,

Ryan ManaRa,

Intervenor,

CIVIL NO. 23-276-DKW-KJM

MOTION FOR LEAVE TO INTERVENE AS

PLAINTIFF.

MEMORANDUM IN SUPPORT OF MOTION;

CERTIFICATE OF SERVICE.

MOTION FOR LEAVE TO INTERVENE AS PLAINTIFF

I am Ryan ManaRa the Movant.

I, hereby respectfully move this court for leave to intervene, in this action, as of right, and as

Plaintiff pursuant to Rule 24(a)(2) of the US District Court Rules of Civil Procedure.

I, Ryan ManaRa, intervene as of right and as a Plaintiff to protect my interests in property held by Defendant KALALEA PLANTATION LLC, Benjamin Garfinkle and their accomplices not yet named in this action as of the date of this application, to which movant will seek to join as necessary and indispensable parties whose names are known as Rochelle Keoho, Liz Brainard and Lydiamae Presbitero of OLD REPUBLIC TITLE & ESCROW OF HAWAII, so that I can properly assert and protect my interest of which the Defendant KALALEA PLANTATION LLC, Benjamin Garfinkle and their accomplices Rochelle Keoho, Liz Brainard and Lydiamae Presbitero of OLD REPUBLIC TITLE & ESCROW OF HAWAII are depriving me of.

My intervention is an as of right and as a Plaintiff based upon the following:

- 1) I claim an interest relating to the property and transaction which is the subject of this action, and I am so situated that the disposition of this action may as a practical matter impede and or impair my ability to protect my interest and property, because none of the existing parties adequately represent any of my interests.
- 2) My motion for intervention is timely.

I hereby verify that the foregoing and all of my statements I make here to be true and correct.

DATED: Moloaa, Koolau, Mokupuni Kauai, Ko Hawaii Pae Aina December 12, 2023.

s/ Ryan ManaRa

MEMORANDUM IN SUPPORT OF MOTION

Rule 24. Intervention

Rule 24(a)(2) of the Federal Rules of Civil Procedure, in relevant part, provides:

“(a) INTERVENTION OF RIGHT. On timely motion, the court must permit anyone to intervene who: ... (2) claims an interest relating to the property or transaction that is the subject of the action and is so situated that disposing of the action may as a practical matter impair or impede the movant’s ability to protect its interest, unless existing parties adequately represent that interest.”

Defendants KALALEA PLANTATION LLC and Benjamin Garfinkle is, apparently, trying to sell real property that it does not own situate at Aliomanu, Koolau, Mokupuni Kauai, Hawaiian Islands. (See: DKT #14 Amended Complaint filed October 11, 2023)

Defendants KALALEA PLANTATION LLC and Benjamin Garfinkle have employed, hired and contracted Rochelle Keoho, Liz Brainard and Lydiamae Presbitero of OLD REPUBLIC TITLE & ESCROW OF HAWAII who have and (as an accomplice of KALALEA PLANTATION LLC’s scam to sell real property that it does not own), is holding \$350,000 USD that I invested in MEDICINE WOMAN GLOBAL (MEDICINE WOMAN GLOBAL and I are the victims of Defendants KALALEA PLANTATION LLC, Benjamin Garfinkle and all of their accomplices Rochelle Keoho, Liz Brainard and Lydiamae Presbitero of OLD REPUBLIC TITLE & ESCROW OF HAWAII’s scam), that MEDICINE WOMAN GLOBAL is using as the deposit for purchase of real property that KALALEA PLANTATION LLC, Benjamin Garfinkle and their accomplices Rochelle Keoho, Liz Brainard and Lydiamae Presbitero of OLD REPUBLIC TITLE & ESCROW OF HAWAII is trying to sell but apparently does not own.

MEDICINE WOMAN GLOBAL is as of the date of this Motion unable thru no fault of its own

to find representation, required by the FRCP, to protect its interests and consequently my interest (\$350,000 USD that I invested in MEDICINE WOMAN GLOBAL LLC) at risk in this case and no existing parties adequately represent our interests.

I intervene here to protect only my interest in the subject of this action, and I am so situated that disposing of this action may as a practical matter impair or impede my ability to protect my interest; and because no existing party adequately represents my interest.

I appear without representation by counsel because like MEDICINE WOMAN GLOBAL, I am not able to get any lawyer licensed to practice in the STATE OF HAWAII JUDICIARY and this Court to represent me because I am a Naturalized Hawaiian subject; and in the case of WAHINE LAAU LAPA AU i.e. MEDICINE WOMAN GLOBAL, because it is an entity organized under the laws of The Civil Code of the Hawaiian Islands. A treaty and constitutional deprivation of right to property is continuing.

Conclusion

Based on what is above set forth, the record and files in this case; and further argument and evidence to be made and presented at the hearing on this motion, this Honorable Court should grant this Motion and allow me to intervene to protect, at least, my interest in the subject of this action because I am so situated that disposing of this action may as a practical matter impair or impede my ability to protect my interest; and because no existing party adequately represents my interest in the matter before this court.

Dated: December 12, 2023, Moloaa, Kawaihau, Mokuuni Kauai, Ko Hawaii Pae Aina

s/ Ryan ManaRa

CERTIFICATE OF SERVICE

I Ryan ManaRa certify that I have served a true and correct copy of the filed **MOTION FOR
LEAVE TO INTERVENE AS PLAINTIFF** by USPS 1st Class and or HIPS 1st Class Mail on the following parties at their last known addresses below on December 12, 2023, or by the electronic filing by the clerk of the court.

Noa Kanealii Io Pono I Kelii Ua Mau
Aliomanu, Koolau
Mokupuni Kauai
Ko Hawaii Pae Aina. H. I.
Kanaka-maoli-2020@outlook.com

(Sent via email)

KALALEA PLANTATION LLC
6623 LAS VEGAS BLVD. SOUTH
SUITE 340, LAS VEGAS,
Nevada 89119

Benjamin F. Garfinkle
64-991 Mamalahoa Highway
Kamuela
Mokupuni Hawaii
Ko Hawaii Pae Aina. H. I.

Dated: December 12, 2023, Moloaa, Kawaihau, Mokupuni Kauai, Ko Hawaii Pae Aina

s/ Ryan ManaRa